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**VIA E-MAIL TRANSMISSION
AND ECF FILING**

July 25, 2017

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004-1408

**Re: In re Motors Liquidation Company, et al.,
Case No. 09-50026 (MG); Request for Discovery Schedule Regarding
Due Process Violations Related to Non-Ignition Switch Claims**

Dear Judge Glenn:

I represent Celestine Elliott, Lawrence Elliott, Ishmail Sesay, Paul Fordham, Momoh Kanu, and James Tibbs ("Non-Ignition Switch Economic Loss Plaintiffs") in these proceedings. Mr. and Mrs. Elliott are pre-Sale purchasers of a vehicle that they allege contains non-ignition switch defects causing them economic loss. Messrs. Sesay, Fordham, Kanu and Tibbs are each "used car purchasers" of vehicles manufactured by General Motors Corporation ("Old GM") but purchased after the 2009 sale who allege economic loss related to non-ignition switch defects in their vehicles.

The Non-Ignition Switch Plaintiffs I represent seek permission and a schedule to begin discovery concerning whether due process violations in the notice provided prevents the 2009 Sale Order injunction from precluding their claims. The Court may recall discussion at the May 17, 2017 hearing on the 2016 Threshold Issues regarding the fact that Non-ignition Swwitch Plaintiffs have not yet had any reasonable prior opportunity to pursue discovery on the issue. In light of the Court's July 12, 2017 ruling that their claims are encompassed by the 2009 Sale Order injunction, discovery on such issues is now warranted.

Thank you for your consideration.

Respectfully submitted,
/s/ Gary Peller
Gary Peller

Honorable Martin Glenn

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cc: Arthur Steinberg, Esq.
Edward Weisfelner, Esq.
Howard Steel, Esq.
William Weintraub, Esq.
Counsel receiving ECF notification